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Kenai Peninsula Fishermen's Association

Ensuring the Sustainability of Our Fishery Resources



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February 11, 2009

Cook Inlet Salmon Task Force

Chair Representative Craig Johnson

State Capitol Building, Rm. 126

Juneau, AK 99811

Chairman Johnson:

The Kenai Peninsula Fishermen's Association (KPFA) members have been a voice in the Cook Inlet Community for over fifty years. Primarily a representation group for setnet fishing families, we give a voice to members from the southern reach of Kachemak Bay to the northern realm of the Susitna Flats, Fire Island, Kalgin Island, the Central District west side and the eastern shores of Ninilchik, Cohoe, Kasilof, Kalifornsky, Salamantof, East Forelands and others.

Of the approximately seven hundred twenty-five Cook Inlet Limited Entry permit holders, KPFA members represent the majority, eighty-six percent who are Alaskan residents.

We want to applaud the Committee on undertaking such a voluminous undertaking. Many of us in the fisheries business have taken years of participation to understand the concepts of complex biological terms. It is our desire to see that every Committee Member fully comprehend the difficult job that the Alaska Department of Fish and Game (ADF&G) and the Alaska Board of Fisheries (BOF) addresses in taking on the biological management and allowing opportunity for all south-central resource utilization.

Our organizations goal: "Ensuring the Sustainability of Our Fishery Resources"

What this means is that we subscribe to the principles of *Maximum Sustained Yield* and to the slight variation, *Optimum Sustained Yield*. We do not agree with management that is determined by politics or social pressures. We believe that a healthy resource that returns *High Sustained Yields* is the only positive way to manage surplus resources to achieve the most equitable distribution. Unhealthy production caused by man made or natural

interventions must be identified and rectified, mitigated to bring balance and substantial returns for a given salmon species.

The Legislature and the Administration should make the commitment to fund resource protection and development. Management can only fulfill expectations of the users if it has healthy and predictable returns.

Cook Inlet setnetters have harvested in her waters for over one hundred years. Competition with traps and other efficient users, over the years, is nothing new for our setnet fishery. We consider these to be just new and expanding fisheries. Our fishermen have had to reduce their opportunity to harvest by time, area and gear in order to accommodate these new fisheries. We understand the need to share the resource, however we do not agree with being excluded from the harvest opportunities: we believe that resource users need to work within reasonable expectations, predictable fisheries based on sound science.

The ADF&G is inadequately funded, it is impossible in the present situation to give the public maximum utilization of her resources because we have limited knowledge and do not have the proper management plans in place to increase production. Intensive use by a growing population requires an equally intensive long range plan that all users can expect will give them access to their chosen resource.

The Department has chosen its management of our entire State on the principles of *Sustained Escapement Goals*. This is a far departure from establishing *Biological or Maximum Sustained Yields*. This is a cost saving measure by the Department and does nothing to accomplish *High Sustained Yields*. There is no incentive within the Sports Division and very little in the Commercial Division to improve on the numbers of returning fish stocks. This is the new definition of *Sustained Yield* within our State Fish and Game Managers, simply it is apathy, a lack of incentive and direction to accomplish the best that can be.

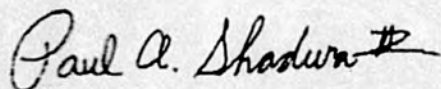
KPFA is looking towards the future. We see the need to expand our knowledge base. We also see the need to increase production to better serve the needs of our residents. Picking the bones from what is left of our resource pleases no one.

If it is necessary for commercial fishermen to manage themselves, they are aware, they have the tools to accomplish this. We believe in real not perceived conservation concerns. State law gives the fishermen the guidance to protect their interests as a separate and significant user group. It is not by any means appropriate to attempt a force out. The result will not change the production problems that currently are the result of inadequate evaluation and protection of the resource.

Forcing commercial fishermen to fish in terminal areas does not improve the success in harvesting, catching or increase production. In-river users will compete with a higher concentration of in-river users. Expectations will be high, actual harvest and catches will be low. We believe that there should be a balance.

In the end, the Task Force should consider that commercial fishermen want not to just catch a fish today; we want to harvest it tomorrow and next year, and the next decade. We have a strong interest in perpetuating strong healthy runs for our families and for your families. We are for the most part all Alaskans, and we all strive for what is best for the future of our State!

With all respects,



Paul A. Shadura II
Executive Director

cc Representative Johansen, Representative Neuman, Representative Stoltze, Representative Doogan, Senator Wagoner, Senator Huggins, Senator McGuire, Senator Wielechowski, Fishery Advisor Cora Crome, Representative Chenault, Representative Seaton, Senator Stevens, Representative Austerman, Representative Olson



United Cook Inlet Drift Association

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ucida@acsalaska.net

January 23, 2009

Dear Legislative Task Force Members,

The purpose of this letter is to respond to a letter to the task force sent through Curt Menard, Mayor of the Matanuska-Susitna Borough dated December 5, 2008.

It is unfortunate that Mayor Menard was misinformed by his advisory panel and as a result he has misinformed the task force as well.

Here are some of the issues that should be clarified or corrected:

Menard states:

"It is apparent to our committee members that the Board of Fisheries (BOF) and the Alaska Department of Fish and Game (ADF&G) primarily manages the Upper Cook Inlet commercial salmon fishery to attain "Maximum Sustained Yields"(MSY) from the Kenai and Kasilof River sockeye salmon."

This statement is incorrect. Since 1999 the BOF passed the Kenai River Sockeye Salmon Management Plan which changed the MSY sockeye salmon goal to an Optimum Goal. The MSY goal was 500,000 to 800,000 fish while the optimum goal is 500,000 to 1 million sockeye salmon. Therefore, the BOF recognized that MSY goals needed to be altered to meet some of the social needs in UCI. The higher sockeye salmon goals would result in reduced returns to the Kenai River on average.

Menard states:

"Today demographics have changed drastically...certain past management practices are no longer acceptable to the rapidly growing portion of the population."

We believe the state must change from the present practice of pursuing maximum sustained yield for a limited audience, when it deprives others (the great majority) of their constitutional right to an equitable share of that resource. Residents of northern Cook Inlet cannot and will not accept management that primarily emphasizes maximum sustained harvests of Kenai and Kasilof sockeye salmon at the almost total exclusion of other salmon species and stocks.

These statements are very unfortunate and misleading. The residents of the Anchorage and Matanuska-Susitna Basin are the major harvesters of Kenai and Kasilof sockeye

salmon. Combined harvest levels in the personal use and sport fishery approach 400,000 to 500,000 fish and most of this harvest is from residents outside the Kenai Peninsula area.

The sockeye salmon sport harvest in the Susitna River is only about 10,000 fish from a total return of 400,000 to 900,000 entering the system. Additionally, Mat-Su fishermen harvest about 3,000 pink salmon from a total return of 10,000,000 to 20,000,000 annually. Putting more sockeye into the Susitna River above the goals does not benefit any users if the excess escapement results in a reduced sockeye production in Kenai and Kasilof River that is presently used by these same residents.

The claim that ADF&G manages to the almost total exclusion of other salmon species and stocks is not proven with any objective data. Review of emergency orders will show that each year ADF&G writes numerous orders restricting the commercial fisheries to move northern bound stocks into the Susitna and other northern drainages.

Finally, if one reviews the escapements for Kenai and Kasilof sockeye salmon relative to goals one will see they are consistently exceeded which refutes the idea that these stocks are managed to the detriment of other stocks.

Menard states:

"Therefore, we believe...manage Upper Cook Inlet salmon for "Optimum Sustained Human Benefits"

This is a very perplexing statement. The State Constitution notes that resources are to be managed for the maximum benefit of the people. No definition of optimum is provided except for three management objectives. These are:

- A. Management of Susitna and Fish Creek is to meet existing in-season escapement goals. This is presently being done. Escapement goals have been met and exceeded based on new data from the weir counts and mark/recapture estimates.
- B. The development of scientifically based escapement goals for in-season commercial management of coho, pink, and chum salmon is also requested. ADF&G has been working on this technical issue and has not done so, not for political reasons but because of biological and technical limitations. For example, in-season management requires counts to be available in a timely manner. The inability to count salmon in the lower Susitna River makes in-season counting impossible and therefore not useful for in-season management of the fisheries. However, other indicators of abundance – the drift gill net harvest and offshore test boat index – can be used to assess overall run strength coming into Cook Inlet
- C. The final request is for genetic identification program that will provide in-season information on all stocks. Again, there are several significant technical issues that limit any in-season use of these types of data. Even if successful, the cost of such a program is very high relative to other priorities for salmon management. Within the Susitna River drainage there are major threats to production including, but not limited to, northern pike infestations, stream blockages and habitat destruction.

Lastly, Menard states:

We recommend that the Task Force consider the following approaches to meeting conservation goals... again thank you for investigating the sub-standard returns of salmon stocks to Northern Cook Inlet...

The idea that returns to the Northern Cook Inlet are sub-standard is not true for pink, chum, coho, and Chinook salmon. Data on these stocks presented by ADF&G to the BOF has shown that there is no conservation concern for these stocks and that they are healthy. Exploitation rates by the commercial fishery on these stocks are very low and most of the fish are currently reaching their natal streams.

While Susitna sockeye salmon were made a "stock of yield concern" by the BOF, this designation is not a "conservation concern." Yields have decreased in the commercial fishery because of lower production and reduced fishing time. However, lower production is primarily due to issues associated with pike predation, blockages to migration and in-lake production issues. Again, escapement goals have been reached in three of the last three years using the weir counting method widely recognized as the most accurate salmon counting method.

One recommendation that requires further discussion is the concept of a conservation corridor in UCI. First, ADF&G has the authority via emergency order to restrict commercial fishing time by time and area. Therefore, they can use their flexibility to create a conservation corridor at any time if needed.

However, if a conservation corridor as purposed was put in place as proposed, the ability to harvest all salmon stocks in Cook Inlet would be seriously reduced, and the quality of the salmon harvest would decrease. This would cost the citizens of the State millions of dollars for no useful purpose. There are times and areas that the drift gill net fleet must fish in the open waters of UCI for effective management and product quality. To deny this demonstrates a complete lack of understanding of correct fishery management principles as applied to UCI fisheries management.

In summary, it is our opinion that the BOF and ADF&G have listened to the citizens of the State of Alaska, including those from the Northern areas, and have made a series of management plans and management actions that are consistent with the maximum benefit to the citizens of this State, including the Anchorage and Matanuska-Susitna areas. In contrast the letter from Mayor Menard including the recommendations would cause direct harm to these same citizens, including his residents of Anchorage and the Mat-Su.

Sincerely,

Original Signed Document

Roland Maw
UCIDA Executive Director
ams



MATANUSKA-SUSITNA BOROUGH

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December 5, 2008

TO: The Joint Legislative Cook Inlet Salmon Task Force

THROUGH: Curt Menard, Mayor *CM*
Matanuska-Susitna Borough

FROM: Tom Kluberton, Chair *TK*
Matanuska-Susitna Mayor's Blue Ribbon Sportsmen's Committee

SUBJECT: Upper Cook Inlet Salmon Fisheries

We express our appreciation to the Joint Legislative Task Force members for making time in your busy schedules to address the complexities of the Upper Cook Inlet (UCI) Salmon Fishery. We understand the enormity of that challenge, and owe a debt of thanks to you for your participation.

Our goal in writing is to share with you the combined experience of our members, focused by our activities as a committee. We hope our thoughts may assist you in the development and implementation of measures that will ensure improved management of this extremely important fishery.

It is apparent to our committee members that the Board of Fisheries (BOF) and the Alaska Department of Fish and Game (ADF&G) primarily manages the Upper Cook Inlet commercial salmon fishery to attain "Maximum Sustained Yields" from Kenai and Kasilof River sockeye salmon. Sockeye stocks from these systems have historically been the "big money" fisheries, and (perhaps) in years past, the demographics in south-central Alaska rendered such a management practice generally acceptable.

Today demographics have changed drastically. With 80,000+ residents in the Mat-Su Borough and an Anchorage Bowl population around 300,000, certain past management practices are no longer acceptable to a rapidly growing portion of the population. Another significant factor is the incredible growth of the Tourism Industry. Simply put, the economic impact of non-commercial fishing (sports, personal use, and subsistence) has exploded. Our committee eagerly awaits the results of a study commissioned by ADF&G into the economic impacts of sport fishing in Alaska. We fully expect this study, which is scheduled for release in December, will confirm the mushrooming economic value of sport fishing within the Upper Cook Inlet region.

Since salmon are a common property resource, we believe the state must change from the present practice of pursuing maximum sustained yield for a limited audience, when it deprives others (the great majority) of their constitutional right to an equitable share of that resource. Residents of northern Cook Inlet cannot and will not accept management that primarily emphasizes maximum sustained harvests of Kenai and Kasilof sockeye salmon at the almost total exclusion of other salmon species and stocks. In other words, the passive and coincidental commercial harvest of salmon other than Kenai Peninsula sockeye must be addressed and corrected.

Therefore, we believe that the Legislature should direct the BOF and ADF&G to manage Upper Cook Inlet salmon for "Optimum Sustained Human Benefits" rather than emphasizing economic returns to specific elements (Central District fishers) of the commercial fishery. Movement toward management that features optimum benefits would include, but not be limited to:

- 1) Consistent achievement of existing in-season escapement goals for Susitna River and Fish Creek sockeye;
- 2) Development of scientifically-based escapement goals for in-season commercial management of coho, pink and chum salmon. (in-season commercial goals for these species do not exist)
- 3) Development of a genetic identification program that will ultimately provide a timely, in-season harvest assessment of major stocks.

Managing Cook Inlet salmon as a common property resource given today's demographics and economics requires additional effort and direction from the state. The complexities of managing a mixed-stock fishery are challenging, but tools are available that could make this common property resource more equitably available to all citizens.

We recommend that the Task Force consider the following approaches to meeting conservation goals for all Cook Inlet salmon as well as equitably allocating harvestable surpluses to all users:

- 1) **Implement a Salmon Conservation Corridor in the Central District of Cook Inlet subject to legislative approval in accordance to AS 16.05.251(1).** A Management Plan establishing harvest guidelines and criteria would be developed by the BOF for the conservation corridor. Plan guidelines may include criteria pertaining to where, when and under what standards or conditions fishing may be allowed (if any) within the corridor. Creation of a conservation zone for Cook Inlet would be a step toward the type of harvest practices currently allowed in Bristol Bay; the world's largest sockeye salmon fishery. In the Bay, fishing is normally only allowed within five districts located near the mouths of natal streams in order to minimize problems inherent with mixed stock fishing. A Cook Inlet conservation zone would also likely serve as a catalyst for speedy development of a genetic program to apportion salmon harvest from marine waters to streams of origin e.g., fishing within the corridor might only be allowed when and where the identities of major harvested stocks are known.
- 2) **We believe it is appropriate for the legislature to provide general guidance/policy to the BOF regarding allocation of fishery resources more in line with Alaska's current economics and demographics.** In 1986, the BOF received legislative direction to "establish criteria for allocation of fishery resources" and a list of seven factors to consider when doing so. Since that time, the BOF has **not established criteria** as legislatively mandated by AS 16.05.251(14)(e). We believe the legislature has appropriately delegated the responsibility to allocate fishery resources to the BOF but follow-through in regard to the 1986 directive must occur.
- 3) **The legislature should consider funding professional socioeconomic expertise for the BOF.** The BOF should develop formal methods of integrating socioeconomic information into their decision-making processes. Allocation decisions seem to be based on (1) objective scientific data from the disciplines of fishery biology and management; and (2) nonobjective socioeconomic information from the public (the Subsistence Division of AD&G does provide some socioeconomic information regarding subsistence fishing). Without objective socio-economic data the present approach to allocation can be described as one of extreme caution tending to maintain the status quo. The BOF is hesitant to evoke regulatory changes that would alter allocations for beneficiaries. Lacking appropriate staff, the BOF has a difficult time objectively evaluating the socioeconomic impacts of their allocation decisions. In contrast, the North Pacific Fishery Management Council, the federal analog to the BOF, has multiple economists on staff.

- 4) **Examine the Limited Entry Act to see if this statute is functioning as intended.** The buy-back provision under the Act raises serious constitutional issues because a fishery such as Cook Inlet may become 'too exclusive' under Article 8 Sec. 15 of the Alaska Constitution. The legislature created the Act to insure adequate remuneration for commercial fisherman and to conserve the fisheries. Under the program, permits were not capped at an optimum number (AS 16.43.290), but rather were set at a legally required maximum. The buy-back program was proposed to reduce the number of permits from maximum to optimum (AS 16.43.310) but this has not occurred anywhere in Alaska (except for a small private voluntary buy-back in southeast.) Instead, salmon fisheries such as Cook Inlet have incurred increased capital costs over the thirty plus years since the Act became law. Over-capitalization, coupled with sagging fish prices, requires fishermen to harvest more aggressively just to make "ends meet". Unhealthy economic situations result in increased pressure on regulators to maximize harvests, which in turn often elevates user group conflicts. We encourage the legislature to re-visit the Limited Entry Act to see if modifications are required to allow the buy-back provision to perform as intended. In order to insure the "well-being of the fisheries and all participants", it may be desirable to broaden the Act to include both commercial and non-commercial users. Perhaps, the "too exclusive/monopoly" issue can be legally accommodated by acknowledging that non-commercial and commercial fishermen target the same common property resources. Foregone harvests from bought-back commercial permits need not automatically become available to active permit holders as the legislature could mandate that some or all of the 'additional' salmon be made available to non-commercial users.
- 5) **Provide adequate funding to insure development of DNA-based genetic stock assessment program for the Inlet's commercial salmon harvest.** Such research must not be limited to sockeye salmon, but should extend to other salmon species and ultimately result in timely in-season stock assessment. Funds should also become available to develop sustainable escapement goals for in-season management of coho, pink and chum salmon. Such in-season commercial management goals, the "cornerstones" of sustainable salmon management, do not exist as was previously noted for northern Cook Inlet stocks.
- 6) **To the extent practicable, codify the Alaska Sustainable Salmon Fisheries Policy in Alaska Statute.**

We would like to make you aware the Matanuska-Susitna Borough, the private sector, and several state, federal, and tribal entities, are working together through the Mat-Su Basin Salmon Habitat Partnership to improve and conserve salmon habitat throughout the Northern Cook Inlet drainages. October's Science & Restoration Symposium conducted by this Partnership drew almost 100 scientists and policy-makers to listen to 27 presenters discuss the salmon-related field work they have underway. The cumulative investment in this work is in the millions of dollars and makes the point clear that the leaders and residents of the Northern Cook Inlet recognize the intrinsic and economic value of the salmon resource.

Again, thank you for investigating the sub-standard returns of salmon stocks to Northern Cook Inlet drainages and for your work towards balancing the management of this sustainable resource that delivers benefits to all users, Alaska's economy and way of life.

If we can be of any assistance to your endeavor, we are eager to help. Please feel free to call upon us.

From: dwimar@gci.net [mailto:dwimar@gci.net]

Sent: Monday, October 27, 2008 9:46 AM

To: Rep. Craig Johnson

Cc: Peter Micciche; Mayor Pat Porter; Mayor Dave Carey; Comm Denby Lloyd; Rep. Paul Seaton; Rep. Kurt Olson; Rep. Mike Chenault; Sen. Tom Wagoner; Cora Crome; Frank Bailey; Governor Sarah Palin (GOV sponsored)

Subject: KAFC Letter to Leg. Task Force on UCI Fisheries

Dear Chairman Johnson,

Please see the attached advanced copy of a letter to the Task Force from our group, Kenai Area Fisherman's Coalition (KAFC). This letter outlines information we would ask the task force members to consider before making any recommendations to the legislature during this upcoming session. We request the members base their decisions on the best scientific information available and stay clear of agendas driven by special interest.

Our group has 10 retired fisheries scientists and managers on our BOD with a thorough understanding of all fisheries studies conducted in UCI over the past 25 years. We represent private resource users and have no commercial interests. We would be glad to assist the Task Force with any additional information or scientific evaluation they may desire.

Please pass this letter on to all Task Force members and keep us informed on Task Force issues as they develop.

Respectfully Submitted,

Dwight Kramer - KAFC Chairman
283-1054



Kenai
Area
Fisherman's
Coalition

PROTECTING YOUR FISHING RIGHTS & RESOURCES

P. O. Box 375 Kenai, Ak. 99611 (907) 283-1054 dwimar@gci.net

Legislative Task Force on Upper Cook Inlet Fisheries

October 27, 2008

C/o Rep. Craig Johnson

716 W. 4th Ave. Ste. 640

Anchorage, Ak. 99501-2133

Dear Chairman Johnson,

The Kenai Area Fisherman's Coalition (KAFC) is an organization composed of scientists and concerned users of the Kenai Peninsula waters. We have 10 fisheries biologists in our organization that provide over 120 years of experience on the Kenai and Upper Cook Inlet (UCI) in both research and management. We also like to consider ourselves a "Joe Fisherman" organization since we have no commercial interest. Our membership is close to 200 members.

We believe that habitat protection should be the primary goal of any resource organization or government agency. We support the concept that user group needs are secondary to habitat protection. We also strongly support salmon escapement goal management. This is the foundation Alaska has developed to maintain salmon resources at sustainable levels.

We have been following the task force progress and feel that our input would be of value to you at this time. As you are now aware, the UCI fisheries are very complex. User groups tend to be selective in their use of information and ADF&G and the Board of Fisheries (BOF) are caught in the middle of the allocation battles.

This has led to distrust and confusion within the public and regulatory agencies. It has also created uncertainty in how stable the various fisheries will be in the future. The creation of the legislative task force did not help this situation. We recommend no major alterations to the present management framework.

We do have some comments for the task force to consider:

1. **UCI complexity is difficult to understand** – The task force was created out of concern for UCI northern salmon stocks and allocation issues in the Mat/Su area.

We attended and participated in the February 2008 BOF meeting and found it to be a fair and reasonable process. Decisions made there did not threaten any resource and balanced the user needs in an appropriate manner.

We would caution that making changes to the BOF process or the way UCI fisheries are managed would be a mistake at this time. As sport and personal use fisherman we are concerned that the task force will focus on the upper Inlet and will lose sight of the ramifications of their actions on the Kenai Peninsula systems where most of South-central fisherman fish.

Escapement goals for Kenai Sockeye and Chinook salmon have been established to provide high sustained yields for the benefit of all user groups. There is compelling evidence that when these goals are exceeded future yields will be reduced. Action taken in the drift gill net fleet to reduce exploitation rates for Northern bound salmon may cause fish managers to exceed Kenai and Kasilof River goals and therefore contribute to smaller returns and less harvestable surplus in the future.

Only about 10,000 Sockeye salmon are harvested by sport fisherman in the Susitna River basin while hundreds of thousands are harvested by personal use and sport fisherman in the Kenai River. Records indicate that of the over 300,000 salmon harvested in the Kenai / Kasilof personal use fisheries about 93% are harvested by folks from the Anchorage and Mat/Su areas. Similar comparisons exist for the additional 150,000 annual Sockeye sport harvest on the Kenai River alone. Please remember this when you make your recommendations. Providing a few thousand more sockeye to the Susitna River may result in the loss of tens of thousands of salmon to Anchorage and Mat/Su sport and personal use fisherman who fish the Kenai River.

Relative to Chinook salmon, you should know by now that severe restrictions on the drift gill net fleet will allow more sockeye salmon headed to the Kenai Peninsula streams to reach the near shore areas of the western Kenai Peninsula. This has two impacts – one it requires more fishing time for the set net fishery which increases the harvest of Kenai River Chinook salmon. Second, the quality of the commercial salmon harvested is decreased as fish have held longer in the fresher waters of UCI.

Thus, there is a significant cost for restricting the drift gill net fleet more than necessary to meet escapement objectives in the Northern District.

2. Data needs to be examined closely – The ADF&G has spent thousands of dollars on studies of Northern bound salmon. The task force should examine that data relative to the objectives of the task force.

For example, ADF&G tagging studies show that most Northern bound salmon are making it into the freshwaters of the region. Exploitation rates on Chum, Coho, Chinook, and Pink salmon by the commercial fisheries are less than 15 percent. Therefore, 85 percent of these stocks are available for sport anglers.

Sockeye salmon are reaching the spawning grounds in numbers far higher than previously thought and escapement objectives are being met and have been met in the past. The Bendix counting system was giving everyone a false impression of actual escapement and therefore a false conclusion that goals were not being met.

The task force needs to decide if major alterations in the present fisheries are required if only 15% more Coho, Chum, Pink, and Chinook salmon (maximum level) are put in the system (this would only be accomplished with a total closure of the commercial fisheries – both set and drift gill net). We maintain that this is not required and that the additional 15% would not be measurable in the sport and personal use fisheries on these stocks.

Relative to Sockeye salmon, our concern in the Northern District is a loss of production due to invasive species and blockage of migration of adult salmon. For example, Shell Lake had over 60,000 spawning fish return in 2007 but in 2008 only a few thousand returned. Why? The parent year for the 2008 was 2003/4 and in those years numerous beaver dams blocked Shell Lake Sockeye salmon from reaching the spawning grounds. A lack of spawning fish means poor future returns. The task force needs to concentrate its recommendations on the real threats to production in the Northern District streams – invasive species, blockage of fish migration, and habitat destruction.

3. What is the real issue - The concern of Mat/Su user groups is that fishing opportunity and catch rates are not meeting their needs.

We examined the sport fish harvest figures for the Northern District and found that the exploitation rates by sport fisherman are very low relative to the stock abundance estimates from ADF&G studies. For example, harvest of Sockeye, Chum, and Pink salmon are very low (less than 10,000 fish in a number of years) and the harvest of Coho is very low relative to the hundreds of thousands of Coho entering the northern streams.

We believe that the issue is access and not fish abundance. A number of systems in the Susitna River are just not available to the average angler. Locations that are available become crowded and have lower success rates. We understand these issues, but putting 15% more fish into these areas will not solve the problem. The task force should concentrate its recommendations on how to improve access into northern district streams.

4. Buy back programs – We would suggest you not pursue this option.

The foundation, as we've stated, for Alaska salmon management is meeting escapement goals. Therefore, as long as these goals are maintained any fishing fleet reduction just means more fishing time for the remaining commercial effort. The end result is the same – no change in harvest per se.

Consequently, if the task force recommends a reduction in the drift fleet to a level that the historical harvest is reduced then the issues identified with Kenai River Sockeye management become more pronounced. We cannot accept this as it would impact thousands of residents of the Peninsula as well as Anchorage and the Mat/Su which rely on high sustained yields from these systems.

While some user groups want to downplay the risk of over-escapement, the data set for the Kenai and Kasilof Rivers is sound. The risk is just too great to put hundreds of thousands of Sockeye into the Kenai River to gain a minor increase in Susitna bound stocks. From a cost/benefit ratio it makes no sense. Hundreds of thousands of sockeye salmon represents millions of dollars to the Kenai Peninsula communities for little or no measurable benefit in the Mat/Su Sockeye salmon fisheries.

5. ADF&G studies in the Susitna River – We believe that ADF&G and the legislature have not been wise in how monies have been spent on research in the Susitna River.

The ADF&G has wasted hundreds of thousands of dollars on mark/recapture studies and went ahead with these studies when our group and others recommended against this approach. We favor weirs on Sockeye salmon streams to count Sockeye salmon. We also favor a beaver control program to reduce dams which block access to spawning areas; pike control programs, restoration programs for treated lakes, and strict habitat protection regulations.

Unfortunately, the legislature has continued to fund studies with little management benefit. The most recent is the studies proposed by ADF&G on Coho and Chum salmon. We would strongly recommend that these monies be redirected to more useful research/management actions in the Susitna basin. In fact, in a recent letter from the BOF chairman Jensen to Governor Palin (October 14, 2008) he stated "... the legislature's choice of the coho and chum salmon studies was not the fault, nor even the preference, of the department".

As a sport fishing group we have at times appeared to be in conflict with what on the surface appears to be a benefit to sport fisherman. However, we understand from our experience and advice of the professional members of our group that the commercial fleet is a necessary component to maintain escapement goal management for all systems. We would caution the task force to keep this in mind when discussing your recommendations.

On a positive note, we would recommend that the task force examine future funding for the BOF. Our experience is that the BOF needs its own scientific staff to help them digest and understand the volumes of material they receive. The ADF&G is not capable because of reduced staffing and increasing work loads on their personnel.

We would like to thank the task force for taking these issues seriously and hope that your recommendations are well thought out and researched.

Dwight Kramer, KAFC Chairman

Cc: Governor Sarah Palin
Frank Bailey, Board and Commissions
Cora Crome, Office of the Governor
Sen. Tom Wagoner
Rep. Mike Chenault
Rep. Kurt Olson
Rep. Paul Seaton
Denby Lloyd, Commissioner of ADF&G
Mayor Dave Carey, Kenai Pen. Borough
Mayor Pat Porter, City of Kenai
Mayor Peter Micciche, City of Soldotna